

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Chapter 13

WANITA DIGGS

Case No. 13-30802-svk

Debtor.

STIPULATION REGARDING MOTION FOR RELIEF FROM AUTOMATIC
STAY AND ABANDONMENT

WHEREAS, Parc Renaissance Condominium Association, Inc., through its attorneys Whyte Hirschboeck Dudek S.C., filed a motion for relief from the automatic stay and the Debtor filed an Objection to the same;

WHEREAS, the parties have reached an agreement and wish to settle Parc Renaissance Condominium Association, Inc.'s motion without further hearing by the Court;

IT IS HEREBY AGREED between Parc Renaissance Condominium Association, Inc. and the Debtor, by and through her counsel, *Paula R. Brunner* Krysta Kerr, that:

1. Debtor shall make a payment of \$481.00, to be applied to Debtor's post-petition arrears, to Parc Renaissance Condominium Association, Inc. on or before December 29, 2014.
2. Parc Renaissance Condominium Association, Inc. shall file a supplemental claim for the Debtor's remaining post-petition arrears accrued from January 1, 2014 through December 22, 2014, plus \$800 for Parc Renaissance Condominium Association, Inc.'s attorneys' fees and costs, in all a total of \$1,127.00;

Lydia J. Chartre, Esq.
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3. That a six month doomsday provision will be in effect regarding payments due to Parc Renaissance Condominium Association, Inc. commencing on January 1, 2015; and


4. That following the six month doomsday, Parc Renaissance Condominium Association, Inc. shall have the right thereafter to renew its Motion by letter to the Court for the duration of Debtor's Plan.

Dated December 22, 2014.

Whyte Hirschboeck Dudek S.C.
Attorneys for Parc Renaissance
Condominium Association, Inc.

By: s/ Lydia J. Chartre, Esq.

No objection:

Pon s/ 
for Mary B. Grossman
Office of the Chapter 13 Trustee

MILLER & MILLER LAW, LLC
Attorneys for Debtor

By: 